

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 11
)	
BROOK ARCHITECTURE, INC.)	Judge Eugene R. Wedoff
)	
)	
Debtor and Debtor in Possession.)	Case No. 08-24913
)	
)	Hearing: 08/18/09 at 10:00 a.m.

NOTICE OF MOTION

To: See attached service list

PLEASE TAKE NOTICE that I will appear on **Tuesday, August 18, 2009 at 10:00 a.m.**, before the Honorable Eugene R. Wedoff, or any other Judge sitting in his stead, in Courtroom 744, Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois, and will then and there present the **Final Application for Compensation for Professional Services and for Reimbursement of Expenses of Forrest L. Ingram, P.C.**, attorneys for the Debtor and Debtor in Possession, and request an entry of an order in accordance with this application, AT WHICH TIME AND PLACE YOU MAY APPEAR AND BE HEARD.

/s/ Forrest L. Ingram
One of Debtor's attorneys

Forrest L. Ingram, P.C.
Forrest L. Ingram #3129032
Peter L. Berk
Patrick F. Lambe
Helena Milman
Gautham Kaveti
79 W. Monroe St., Suite 900
Chicago, IL 60603
(312) 759-2838

CERTIFICATE OF SERVICE

I, Gautham Kaveti, an attorney, certify that I caused a true and correct copy of the above and foregoing Notice and the document, to which it refers, on all parties entitled to service, by electronic filing through ECF, or by regular U.S. mail, as set forth on the attached service list, at or before 5:00 p.m. on July 24, 2009.

/s/ Gautham Kaveti

SERVICE LIST

By ECF Notice:

U.S. Trustee

William T. Neary
Office of the U.S. Trustee, Region 11
219 S. Dearborn Street
Room 873
Chicago, IL 60604
USTPRegion11.ES.ECF@usdoj.gov

Harris N.A.
c/o Scott C. Frost
Statman Harris & Eyrich, LLC
200 West Madison, Ste. 3820
Chicago, Illinois 60606
sfrost@statmanharris.com, drizzuto@statmanharris.com

Eskenazi, Farrell & Fodor, P.C.
c/o Philip F Torongo
Stein Ray & Harris
222 W Adams St Suite 1800
Chicago, IL 60606
pft@steinrayharris.com

Lyon Financial Services, Inc. d/b/a US Bancorp Manifest Funding Services
c/o Alex Darcy
Askounis & Darcy, PC
401 N. Michigan Ave.
Suite 550
Chicago, IL 60611
adarcy@askounisdarcy.com

Via U.S. Mail:

Debtor

Ms. Ramona Westbrook
Brook Architecture, Inc.
2325 South Michigan Avenue
Suite 300
Chicago, IL 60616

**IN THE UNITED STATES BANKRUPTCY COURT
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In re:)	Chapter 11
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**FINAL APPLICATION FOR COMPENSATION FOR PROFESSIONAL
SERVICES AND FOR REIMBURSEMENT OF EXPENSES
OF FORREST L. INGRAM, P.C.**

FORREST L. INGRAM, P.C., (“Applicant”) on behalf of its attorneys, duly appointed counsel for Debtor and Debtor in Possession Brook Architecture, Inc. (the “Debtor”), hereby makes its Final Application for Compensation (“this Application”) pursuant to Section 330 of the United States Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 607 and requests that this Honorable Court enter an order allowing compensation for legal services rendered and reimbursement of expenses incurred from May 1, 2009 through July 7, 2009. In support of this Application, Applicant states as follows:

1. On August 28, 2008, the Debtor’s President, Ramona Westbrook (“Westbrook”) executed an Engagement Agreement with Applicant for services in connection with the Chapter 11 case.
2. On September 19, 2008 (the “Petition Date”), the Debtor’s Chapter 11 case was filed. The Debtors remain in possession of their assets and continue to conduct its business pursuant to 11 U.S.C. §§1107 and 1108.

3. On October 15, 2008, the Court entered an order approving the appointment of the attorneys of Forrest L. Ingram, P.C., as attorneys of record for Debtor and Debtor in Possession, retroactive to August 28, 2008. A copy of the Order is attached, marked **Exhibit A**, and made part of this pleading.
4. On July 7, 2009, the Court confirmed the Debtor's Second Amended Plan of Reorganization.
5. The times and chronology of the Applicant's services rendered in the above-entitled proceedings for the period from May 1, 2009 through July 7, 2009, are scheduled in detail to the tenth of an hour and arranged *by nature* in **Exhibit B**, attached hereto. A copy of **Exhibit B** has been sent to the Debtor with a request for review of the details, and for objections, if any. The Debtor has not objected to any items listed, to any of the services rendered, nor to any of the fees requested. Applicant's timesheets have also been arranged *by attorney* in **Exhibit C**, attached hereto.
6. A brief description of the credentials of each employee of Forrest L. Ingram, P.C. for whom compensation is sought is attached hereto as **Exhibit D**.
7. All services for which compensation is requested were in connection with these bankruptcy proceedings. All services performed after the commencement of the above-entitled proceedings were in connection with the performance of duties of the Debtors and Debtors in Possession as prescribed by the Bankruptcy Code or pursuant to orders of this Court.
8. Applicant requests the allowance of payment of compensation for legal services during the period May 1, 2009 through July 7, 2009 in the sum of \$6,514.00

9. The services rendered by Applicant were directly related and necessary to the administration of the Chapter 11 case, including but not limited to representing the Debtor in negotiating with an objecting creditor, confirming a plan of reorganization, and drafting Applicant's Second Interim Application for Compensation.

10. HOURS OF SERVICES PROVIDED BY CATEGORY and ATTORNEY AND CLERK TIMES – Forrest L. Ingram, P.C. provided a total of 22.4 hours of services during the current period. The hours, broken down by natures, are summarized in **Exhibit B**. They are as follows:

a. Admin Approximately 1.7 hours of time and service were rendered in connection with matters that were administrative in nature including, but not limited to, conferencing with the Debtor's President about all aspects of the chapter 11 case, and drafting a motion to shorten notice. For these services, Applicant asks for fees of **\$296.50**.

b. CashC Approximately 0.5 hours of time and service were rendered in connection with matters relating to utilizing cash collateral, including, but not limited to, drafting a motion for authorization to use cash collateral. For such services, Applicant seeks **\$114.00**.

c. CM Approximately 3.6 hours of time and service were rendered in connection handling contested matters, including, but not limited to, responding to Lyon Financial's objection to confirmation of the plan, and later negotiating with Lyon Financial to resolve the disputes. For such services, Applicant seeks **\$1,186.50**.

d. Cred Approximately 2.1 hours of time and service were rendered in

connection with dealing with creditors, including, but not limited to, negotiating with Lyon Financial and drafting motion relating to the settlement. For such services, Applicant seeks **\$394.00**.

e. DS&P Approximately 11 hours of time and service were rendered in connection with obtaining confirmation of the Debtor's Plan of Reorganization and Disclosure Statement, including, but not limited to, meeting with Debtor's President regarding the obstacles to confirmation, negotiating with creditors to settle matters leading to the confirmation of the Plan, and appearing on motions to settle disputes relating to the Plan. For such services, Applicant seeks **\$3,568.50**.

f. Fee Approximately 2.1 hours of time and service were rendered in connection with the Applicant's Second Interim Fee Application, including, but not limited to, compiling the time sheets, drafting the Fee Application and and revising the Fee Application. For such services, Applicant seeks **\$492.50**.

g. Obj Approximately 0.5 hours of time and services were incurred with respect to objections to the claims of creditors, including, but not limited to, conferencing with the Applicant's associates regarding the handling of objecting to Lyon Financial's claim. For such services, Applicant seeks **\$220.00**.

h. Trste Approximately 0.9 hours of time and services were incurred in connection with communicating with the United States Trustee, including, but not limited to, compiling and sending response to an inquiry from the United States Trustee's office. For such services, Applicant seeks **\$242.00**.

10. HOURS OF SERVICES PROVIDED BY ATTORNEYS AND CLERKS –
the firm provided a total of approximately 22.4 hours of service, broken down by attorney as indicated on **Exhibit C**, as follows:

a. Attorney Forrest L. Ingram provided approximately 9.7 hours of services at \$440 per hour, including all phases of the Chapter 11 case.

b. Attorney Helena Milman provided approximately 4.0 hours of services at \$200 per hour, including all phases of the Chapter 11 case.

d. Attorney Gautham Kaveti provided approximately 7.8 hours of services at \$175 per hour, including all phases of the Chapter 11 case.

f. Law Clerk Vik Chaudhry provided approximately 0.9 hours of services at \$90 per hour, primarily relating serving notice for motions.

11. Applicant's customary fee includes actual compensation for time and services, fixed overhead, salaries, and unallocable costs.

12. Applicant is seeking reimbursement of expenses in the amount of \$113.02.
An itemization of expenses is attached to this Application as **Exhibit E**.

13. Prior to Petition Date, Applicant received from Debtor and deposited into its trust account, as and for a retainer and the payment of the filing fee for a Chapter 11 case, the sum of \$9,039.00.

14. On February 11, 2009, the Court awarded Applicant \$10,768.00 in compensation for services and \$1,056.68 in reimbursement for expenses, for a total of \$11,824.68. Debtor has paid this amount in full.

14. On June 3, 2009, the Court awarded Applicant \$15,536.50 in compensation for services and \$360.96 in reimbursement for expenses, for a total of \$15,897.46.

Debtor has paid this amount in full.

15. This Application and a Notice of Hearing on the Final Application has been sent to the Debtor, to the U.S. Trustee, and to parties entitled to notice. A Notice of Hearing on this application has likewise been sent to all other creditors and parties of interest, along with a summary of all services provided by Debtors' counsel to the Debtors. A Certificate of Service for the Notice has been filed with the Clerk of the Court.

16. This Court has jurisdiction over the subject matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

WHEREFORE, Applicant respectfully requests that the Court conduct an appropriate hearing on Counsel's final application and allow a reasonable fee to Debtor's Counsel in the sum of \$6,514.00 for services for the period of May 1, 2009 through July 7, 2009, and reimbursement of expenses in the amount of \$113.02 for a total of \$6,627.02. Applicant asks for such other relief as may be appropriate.

Respectfully Submitted,

Forrest L. Ingram, P.C.
/s/ Forrest L. Ingram
Attorney for the Debtor

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